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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	:
RUDOLPH W. GIULIANI	: Case No. 23-12055 (SHL)
a/k/a RUDOLPH WILLIAM GIULIANI,	:
	:
Debtor.	:
-----X	

**NOTICE OF FILING
OF PROPOSED ORDER DENYING
DEBTOR'S MOTION FOR AN ORDER MODIFYING
THE AUTOMATIC STAY FOR THE LIMITED PURPOSE OF
ALLOWING THE DEBTOR TO PROCEED WITH PROSECUTING
AND PERFECTING THE FREEMAN APPEAL BEFORE THE D.C. CIRCUIT**

PLEASE TAKE NOTICE that on April 26, 2024, the above-captioned debtor (the "Debtor") filed the *Debtor's Motion for an Order Modifying the Automatic Stay for the Limited Purpose of Allowing the Debtor to Proceed with Prosecuting and Perfecting the Freeman Appeal Before the D.C. Circuit* [Docket No. 195] (the "Motion").

PLEASE TAKE FURTHER NOTICE that on May 7, 2024, the Official Committee of Unsecured Creditors (the "Committee") appointed in the Debtor's chapter 11 case filed the

Objection of the Official Committee of Unsecured Creditors of Rudolph W. Giuliani to the Debtor's Motion for an Order Modifying the Automatic Stay for the Limited Purpose of Allowing the Debtor to Proceed with Prosecuting and Perfecting the Freeman Appeal Before the D.C. Circuit [Docket No. 205].

PLEASE TAKE FURTHER NOTICE that on May 7, 2024, Ms. Ruby Freeman and Ms. Wandrea' ArShaye Moss (together, the "Freeman Plaintiffs" and collectively, the Freeman Plaintiffs, the Debtor and the Committee, the "Parties") filed the *Objection of Ruby Freeman and Wandrea' ArShaye Moss to Debtor's Motion for an Order Modifying the Automatic Stay* [Docket No. 207].

PLEASE TAKE FURTHER NOTICE that on May 14, 2024, the Court held a hearing on the Motion. For the reasons set forth on the record at the Hearing, the Court denied the Motion and directed the Parties to submit an agreed form of order denying the Motion.

PLEASE TAKE FURTHER NOTICE that an agreed form of order denying the Motion (the "Proposed Order") is attached hereto as **Exhibit A**, and each of the Parties has reviewed and signed off on the Proposed Order.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and the Proposed Order may be obtained by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: May 20, 2024
New York, New York

/s/ Philip C. Dublin

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*Counsel to the Official Committee of
Unsecured Creditors of Rudolph W. Giuliani*

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

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:
:
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Chapter 11

RUDOLPH W. GIULIANI

Case No. 23-12055 (SHL)

a/k/a RUDOLPH WILLIAM GIULIANI,

Debtor.
-----X

**ORDER DENYING DEBTOR'S
MOTION FOR AN ORDER MODIFYING
THE AUTOMATIC STAY FOR THE LIMITED PURPOSE
OF ALLOWING THE DEBTOR TO PROCEED WITH PROSECUTING
AND PERFECTING THE *FREEMAN* APPEAL BEFORE THE D.C. CIRCUIT**

Upon the *Debtor's Motion for an Order Modifying the Automatic Stay for the Limited Purpose of Allowing the Debtor to Proceed with Prosecuting and Perfecting the Freeman Appeal Before the D.C. Circuit* [Docket No. 195] (the "Motion") of Rudolph W. Giuliani a/k/a Rudolph William Giuliani (the "Debtor") for entry of an order modifying the automatic stay for the limited purpose of allowing the Debtor to take the steps necessary to prosecute his appeal to the United States Court of Appeals for the D.C. Circuit (the "D.C. Circuit Court") from the judgment in the case of *Freeman et al. v. Giuliani*, No. 1:21-cv-03354-BAH (United States District Court for the District of Columbia) (together with the Debtor's appeal to the D.C. Circuit Court, the "Freeman Litigation"); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this proceeding being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue of this proceeding being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having reviewed the (i) *Objection of the Official Committee of Unsecured Creditors of Rudolph W. Giuliani to the Debtor's Motion for an Order Modifying the Automatic Stay for the Limited Purpose of Allowing the Debtor to Proceed with Prosecuting and Perfecting the Freeman Appeal Before the D.C. Circuit* [Docket No. 205] and (ii) *Objection of Ruby Freeman and Wandrea'*

ArShaye Moss to Debtor's Motion for an Order Modifying the Automatic Stay [Docket No. 207]; and the Court having heard the arguments of the parties on the Motion at a hearing on May 14, 2024 (the "Hearing"); and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. For the reasons set forth on the record at the Hearing, the Motion is **DENIED** without prejudice to renewal in light of changed circumstances.

2. The automatic stay shall remain in place with respect to the Freeman Litigation and any appeal thereof, and no further action may be taken in the Freeman Litigation without further order of this Court.

3. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE